

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND
SOUTHERN DIVISION**

UNITED STATES OF AMERICA

*

vs.

*

Case No.: 18-cr-00358 GJH

RENALDO S. HAYES

*

Defendant

*

**DEFENDANT MOTION
FOR APPROPRIATE RELIEF
(Emergency Request for Detention Hearing)**

Defendant Renaldo S. Hayes (“Mr. Hayes”), by and through his undersigned counsel, John M. McKenna and Brennan, McKenna & Lawlor, Chartered, moves this Honorable Court to set this matter in for an emergency detention hearing and states for the following reasons:

1. Mr. Hayes is charged by indictment with felon in possession of firearm and ammunition. Mr. Hayes entered a guilty plea on February 14, 2019 and is awaiting sentencing on June 17, 2019.

2. Mr. Hayes’ sister Blessings Hayes unexpectedly passed away on April 23, 2019. Her funeral is scheduled for Tuesday, April 23, 2019 at 11:00 a.m. at the Refugee Temple in Washington, DC. Mr. Hayes is extremely close with his family and this is a hard time for them. Mr. Hayes would like to be with his family at this time to deal with the death of his sister.

3. Mr. Hayes currently resides with his mother at 4815 John Street, Suitland, Maryland. All of Mr. Hayes’ family and friends reside in the Washington Metropolitan Area. Prior to being detained, Mr. Hayes was gainfully employed at DNA Body Shop and CMT recycling.

4. Undersigned counsel is requesting an emergency hearing for today, April 22, 2019.

5. Assistant United States Attorney Elizabeth Wright of the Office of the United States Attorney objects to the relief sought in this motion.

6. Mr. Hayes will present more information at a hearing on this matter.

WHEREFORE, defendant Renaldo Hayes, by and through his undersigned counsel, John M. McKenna and Brennan, McKenna & Lawlor, Chartered, prays that this Honorable Court:

A. Grant this Motion For Appropriate Relief, by issuing an order setting an emergency Detention hearing in this matter; and,

B. Grant such other and further relief, which this Honorable Court deems just and proper.

Date: April 22, 2019

Respectfully submitted,

John McKenna

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY on this 22nd day of April 2019, that a true and accurate copy of the foregoing Motion was electronically served upon all parties.

John McKenna

John M. McKenna – Bar No. 14894